

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

IN RE:
MICHELLE NAOMI CAMPBELL-THOMAS
Debtor(s)

BCN#: 07-11516RGM
Chapter: 13

OBJECTION OF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR THE
REGISTERED HOLDERS OF GSAA HOME EQUITY TRUST 2006-S1, MORTGAGE PASS
TROUGH CERTIFICATES, SERIES 2006-S1
TO PROPOSED CHAPTER 13 PLAN AND
CONFIRMATION THEREOF

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR THE REGISTERED
HOLDERS OF GSAA HOME EQUITY TRUST 2006-S1, MORTGAGE PASS TROUGH
CERTIFICATES, SERIES 2006-S1, and its assignees and/or successors in interest, a secured creditor in
the above-entitled Bankruptcy proceeding, hereby submits the following objections to the confirmation of
the Chapter 13 Plan proposed by Debtor:

1. This objecting secured creditor is the beneficiary of a trust deed on property commonly known as 43118 ROCKY RIDGE COURT, Leesburg, VA 20176; the promissory note and deed of trust were attached to the proof of claim filed by the secured creditor.
2. The debtor is due for 9 pre-petition monthly payments in the amount of \$2,404.62 per month, the late charges in the amount of \$480.92 and property preservation expenses in the amount of \$674.34. No payments have been received since this bankruptcy petition was filed June 14, 2007.
3. The proposed Plan does not set forth a reasonable schedule and time period for the payment of arrearages on the deed of trust.
4. The proposed Chapter 13 plan does not provide this objecting secured creditor with adequate protection or adequate security, according to Sections 362 and 1325(a) of the Code.
5. As indicated by the debtor's payment history and schedules, the Plan is not feasible.
6. The Plan does not propose to pay the secured creditor's entire claim as shown in its proof of claim in the amount of \$22,946.84.

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CONCLUSION

Any Chapter 13 Plan proposed by Debtors must provide for and eliminate the objections specified above in order to be feasible and to provide adequate protection to this objecting secured creditor. It is respectfully requested that confirmation of the Chapter 13 Plan as proposed by Debtor be denied.

WHEREFORE, secured creditor prays as follows:


1. That confirmation of the proposed Chapter 13 Plan be denied.
2. For attorney's fees and costs incurred herein.
3. That a hearing be held **August 1, 2007, at 10:30 AM at Judge Mayer's Courtroom, 200 South Washington Street, 3rd Floor, Courtroom III, Alexandria, VA** on this objection.
4. For such other relief as this Court deems proper.

Dated: 7-5-07

Respectfully submitted

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS
TRUSTEE FOR THE REGISTERED HOLDERS OF GSAA
HOME EQUITY TRUST 2006-S1, MORTGAGE PASS THROUGH
CERTIFICATES, SERIES 2006-S1

By Counsel:



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I certify that I have electronically transmitted and/or mailed true copies of the above Objections to the Chapter 13 Plan, by First Class Mail, postage prepaid on this 5th day of July, 2007 to the following:

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